

**Exhibit A**

**Proposed Order**

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et*  
*al.*,

Debtors.<sup>1</sup>

PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly Administered)

This filing relates to the  
Commonwealth and ERS.

**ORDER GRANTING FOUR HUNDRED TWENTY-FOURTH OMNIBUS OBJECTION  
(SUBSTANTIVE) OF THE COMMONWEALTH OF PUERTO RICO AND THE  
EMPLOYEES RETIREMENT SYSTEM OF THE GOVERNMENT OF THE  
COMMONWEALTH OF PUERTO RICO TO CLAIMS FOR WHICH THE  
DEBTORS ARE NOT LIABLE**

Upon the *Four Hundred Twenty-Fourth Omnibus Objection (Substantive) of the  
Commonwealth of Puerto Rico and the Employees Retirement System of the Government of the  
Commonwealth of Puerto Rico to Claims for Which The Debtors Are Not Liable* [ECF No. 20050]

<sup>1</sup> The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the "Commonwealth") (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority ("PBA", and together with the Commonwealth, COFINA, HTA, ERS, and PREPA, the "Debtors") (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations)

(the “Four Hundred Twenty-Fourth Omnibus Objection”)<sup>2</sup> filed by the Commonwealth of Puerto Rico (the “Commonwealth”) and the Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS,” and together with the Commonwealth, the “Debtors”), dated February 4, 2022, for entry of an order disallowing in their entirety certain claims filed against the Debtors, as more fully set forth in the Four Hundred Twenty-Fourth Omnibus Objection and supporting exhibits thereto; and the Court having jurisdiction to consider the Four Hundred Twenty-Fourth Omnibus Objection and to grant the relief requested therein pursuant to PROMESA section 306(a); and venue being proper pursuant to PROMESA section 307(a); and due and proper notice of the Four Hundred Twenty-Fourth Omnibus Objection having been provided to those parties identified therein, and no other or further notice being required; and the claims identified in the column titled “Claims to be Disallowed” in Exhibit A to the Four Hundred Twenty-Fourth Omnibus Objection (collectively, the “Claims to Be Disallowed”) having been found to be claims for which the Commonwealth and/or ERS is not liable; and the Court having determined that the relief sought in the Four Hundred Twenty-Fourth Omnibus Objection is in the best interest of the Debtors, their creditors, and all the parties in interest; and the Court having determined that the legal and factual bases set forth in the Four Hundred Twenty-Fourth Omnibus Objection establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor, it is

ORDERED that the Four Hundred Twenty-Fourth Omnibus Objection is GRANTED as set forth herein; and it is further

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<sup>2</sup> Capitalized terms not otherwise defined herein shall have the meanings given to such terms in the Four Hundred Twenty-Fourth Omnibus Objection.

ORDERED that the Claims to Be Disallowed are hereby disallowed in their entirety; and it is further

ORDERED that Kroll is authorized and directed to designate the Claims to Be Disallowed as expunged on the official claims register in the Title III Case; and it is further

ORDERED that this Order resolves Docket Entry No. 20050 in Case No. 17-3283; and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation, or enforcement of this Order.

SO ORDERED.

Dated: \_\_\_\_\_

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Honorable Judge Laura Taylor Swain  
United States District Judge

**EXHIBIT A**

**Schedule of Claims Subject to the Four Hundred Twenty-Fourth Omnibus Objection**

Four Hundred Twenty-Fourth Omnibus Objection  
Exhibit A - Claims to Be Disallowed

	NAME	DATE FILED	CASE NUMBER	DEBTOR	CLAIM #	ASSERTED CLAIM AMOUNT
1	FUENTES MENDEZ, EDGARDO L URB. SANTIAGO CALLE C #6 LOIZA, PR 00772	5/29/2018	17 BK 03566-LTS	Employees Retirement System of the Government of the Commonwealth of Puerto Rico	30499	\$ 50,371.48*
Reason: Claim purports to assert liabilities associated with the litigation captioned Madeline Acevedo Camacho et al. v. Puerto Rico Department of Family Affairs, No. 2016-05-1340 ("Acevedo Camacho"). However, based on documentation submitted by the attorney representing all claimants in the litigation, Claimant is not a named plaintiff in that litigation, and there is therefore no basis for claimant to assert liabilities associated with that litigation against the Commonwealth, HTA, ERS, or any other Title III debtor. Further, even if Claimant were in fact a plaintiff in that litigation, the claim would be duplicative of Claim nos. 32044 and 103072, the master proof of claims filed on behalf of all plaintiffs associated with the litigation captioned Acevedo Camacho.						
2	RUIZ QUINTANA, MERCEDES HC 06 BOX 13149 SAN SEBASTIAN, PR 00685	5/22/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	18470	Undetermined*
Reason: Claim purports to assert liabilities associated with the litigation captioned Francisco Beltrán Cintrón et al. v. Puerto Rico Department of Family Affairs, Case No. KAC-2009-0809 ("Beltrán Cintrón"). However, based on documentation submitted by the attorney representing all claimants in the litigation, Claimant is not a named plaintiff in that litigation, and there is therefore no basis for claimant to assert liabilities associated with that litigation against the Commonwealth, HTA, ERS, or any other Title III debtor. Further, even if Claimant were in fact a plaintiff in that litigation, the claim would be duplicative of Claim nos. 179140 and 93199, the master proof of claims filed on behalf of all plaintiffs associated with the litigation captioned Beltrán Cintrón.						
3	RUIZ QUINTANA, MERCEDES HC-6 BOX 13149 SAN SEBASTIAN, PR 00685	5/24/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	31540	Undetermined*
Reason: Claim purports to assert liabilities associated with the litigation captioned Francisco Beltrán Cintrón et al. v. Puerto Rico Department of Family Affairs, Case No. KAC-2009-0809 ("Beltrán Cintrón"). However, based on documentation submitted by the attorney representing all claimants in the litigation, Claimant is not a named plaintiff in that litigation, and there is therefore no basis for claimant to assert liabilities associated with that litigation against the Commonwealth, HTA, ERS, or any other Title III debtor. Further, even if Claimant were in fact a plaintiff in that litigation, the claim would be duplicative of Claim nos. 179140 and 93199, the master proof of claims filed on behalf of all plaintiffs associated with the litigation captioned Beltrán Cintrón.						
4	SANTANA, MOISES HC 01 BOX 11616 CAROLINA, PR 00985	5/22/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	25010^	\$ 45,896.10*
Reason: Claim purports to assert liabilities associated with the litigation captioned Madeline Acevedo Camacho et al. v. Puerto Rico Department of Family Affairs, No. 2016-05-1340 ("Acevedo Camacho"). However, based on documentation submitted by the attorney representing all claimants in the litigation, Claimant is not a named plaintiff in that litigation, and there is therefore no basis for claimant to assert liabilities associated with that litigation against the Commonwealth, HTA, ERS, or any other Title III debtor. Further, even if Claimant were in fact a plaintiff in that litigation, the claim would be duplicative of Claim nos. 32044 and 103072, the master proof of claims filed on behalf of all plaintiffs associated with the litigation captioned Acevedo Camacho.						
^Claim #25010 also contained on Exhibit A to the 425th Omnibus Claims Objection for Claims to Be Disallowed						
TOTAL						\$ 96,267.58*